

UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

STAG WILLIAMSPORT, LLC,

Plaintiff,

v.

BHN ASSOCIATES, LLC, FIRST
AMERICAN TITLE INSURANCE
COMPANY, and *in rem* against CERTAIN
FUNDS HELD IN ESCROW BY THE
BOSTON OFFICE OF FIRST AMERICAN
TITLE INSURANCE COMPANY,

Defendants.

Civil Action No.
1:21-cv-11958-NMG

**DEFENDANT BHN ASSOCIATES, LLC’S REQUEST TO FILE REPLY BRIEF
IN SUPPORT OF MOTION TO DISMISS OR TRANSFER VENUE**

Pursuant to Local Rule 7.1(b)(3) of the Local Rules for the United States District Court for the District of Massachusetts, defendant BHN ASSOCIATES, LLC (“**BHN**”) hereby requests leave to file a reply brief, which brief will not exceed 10 pages, to the opposition brief filed by plaintiff STAG WILLIAMSPORT, LLC (“**STAG**”) on January 6, 2022 [Dkt. 14] (the “**Opposition**”), which responded to BHN’s Motion to Dismiss for Lack of Personal Jurisdiction or to Transfer Venue, filed on December 13, 2021 [Dkt. 5-7] (the “**Motion**”). STAG has not responded to BHN’s inquiry as to whether it consents to this request.

Good cause is shown by this request because STAG raises issues of jurisdiction concerning the escrowed funds, which BHN has not previously addressed before this Court.

Dated: January 10, 2022

Respectfully submitted,

/s/ Alan D. Kaplan

Alan D. Kaplan (BBO No. 258280)

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CERTIFICATE OF SERVICE

I certify that on January 10, 2022, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Alan D. Kaplan
Alan D. Kaplan